

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

-----X	:	
Alfred Giuliano, Trustee,	:	
Plaintiff,	:	Chapter 11
	:	Case No. 22-50177-CTG
v.	:	(Adversary Proceeding)
	:	<b>Obj. Deadline: 2/27/23</b>
Abbyson Living LLC,	:	<b>Hearing: TBD</b>
Defendant.	:	
-----X		

**MOTION OF THE BILLION LAW TO WITHDRAW AS COUNSEL TO THE  
DEFENDANT**

BILLION LAW here by moves to withdraw from its role as counsel for the captioned defendant (the “Defendant”).

**Jurisdiction & Basis**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief sought herein are sections 105(a) and 327 of the Bankruptcy Code.

**Background**

4. The captioned plaintiff filed this adversary proceeding on February 25, 2022.
5. The case has proceeded through mediation and is now in the discovery phase.

**Relief Requested**

6. By this Application, counsel to the Defendant seeks to be relieved of its duties.

**Basis for Relief Requested**

7. The Defendant and Billion Law are in disagreement over material issues, and the conflict has become irreconcilable.

**Notice**

8. Notice of this Motion will be provided to all parties in this action and the Defendant. The movant respectfully submit that no further notice of this Motion is required.

**No Prior Request**

9. No prior request for the relief sought in this Application has been made to this Court or any other court.

WHEREFORE, based on the facts and disclosures above, the Debtors respectfully request that the Court enter an order in the form proposed hereto.

Dated: February 17, 2023

*/s/ Mark M. Billion #5263*

For Billion Law

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

Alfred Giuliano, Trustee, Plaintiff	:	:
v.	:	Chapter 11
	:	Case No. 22-50177-CTG
Abbyson Living LLC, Defendant.	:	(Adversary Proceeding)

**ORDER: MOTION OF THE BILLION LAW TO WITHDRAW AS COUNSEL  
TO THE DEFENDANT**

Upon consideration of the captioned motion (the “Motion”) and any response(s) to the Motion, after due and proper notice of the motion was given and a hearing was held on the Motion, it is ORDERED that:

1. The Motion is GRANTED.
2. Billion Law is hereby relieved of its duties as Defendant’s counsel.

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v.	:	(Adversary Proceeding)
	:	<b>Obj. Deadline: 2/27/23</b>
Abbyson Living LLC,	:	<b>Hearing: TBD</b>
Defendant.	:	
-----X		

**NOTICE: MOTION OF THE BILLION LAW TO WITHDRAW AS COUNSEL TO THE  
DEFENDANT**

PLEASE TAKE NOTICE that on FEBRUARY 17, 2023, the above-captioned debtor and debtor in possession (the “Debtor”) filed the captioned motion (the “Motion”).

PLEASE TAKE FURTHER NOTICE that any objection or response to the Motion must be (i) filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **FEBRUARY 27, 2023** (the “Objection Deadline”) and (ii) served so as to be actually received no later than the Objection Deadline by the undersigned counsel to the Debtor.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion is scheduled to be held, if necessary, at a time to be determined.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THE REJECTION MOTION IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE REJECTION MOTION WITHOUT FURTHER NOTICE OR OPPORTUNITY FOR A HEARING.

17 FEBRUARY 2023

*/s/ Mark M. Billion, Esq.*  
Billion Law  
1073 S. Governors Ave.  
Dover, DE 19904  
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